THE HONORABLE ROBERT J. BRYAN 2 3 5 6 7 8 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 9 AT TACOMA 10 NINA J. BUJACICH, No. C13-5854-RJB 11 Plaintiff, STIPULATION AND ORDER FOR 12 CONTINUANCE OF DEADLINE v. FOR RESPONDING TO 13 TYLER TECHNOLOGIES, INC., as Plan COMPLAINT Administrator and Sponsor; and TYLER 14 TECHNOLOGIES SHORT TERM **NOTE ON MOTION CALENDAR:** DISABILITY COVERAGE, MONDAY, OCTOBER 28, 2013 15 Defendants. 16 17 **STIPULATION** 18 Plaintiff Nina Bujacich ("Plaintiff") and Defendants Tyler Technologies, Inc. ("Tyler") 19 and Tyler Technologies Short Term Disability Coverage (the "Plan") (collectively 20 "Defendants"), hereby stipulate to a brief extension of Defendants' deadline to answer or 21 otherwise respond to Plaintiff's Complaint. 22 The parties have good reason to request a brief extension pursuant to Western District 23 Local Rule CR 10(g) for the following reason: In an effort to explore a potential resolution of 24 this matter without involving the Court and without engaging in the additional expense of 25 drafting pleadings or motions, the parties have agreed to participate in early settlement 26 negotiations. To facilitate these discussions, the parties find it necessary to request a brief 27 extension of the responsive deadline, as follows: STIPULATION AND ORDER-1 LANE POWELL PC 1420 FIFTH AVENUE, SUITE 4100 No. C13-5854-RJB SEATTLE, WASHINGTON 98101-2338

206.223.7000 FAX: 206.223.7107

121731.0002/5861876.1

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2	CURRENT SCHEDULE PROPOSED REVISED SCHEDULE
3	Defendants must file an answer or otherwise respond to the Complaint by: October 29, 2013  Defendants must file an answer or otherwise respond to the Complaint by: November 19, 2013
4	No scheduling order has been entered and the brief extension will not impact the
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6	efficient proceeding of this litigation should a resolution not be reached.
7	DATED this 28th day of October, 2013.
8	LANE POWELL PC TODD R. RENDA, ATTORNEY AT LAW
9	Dy g/Carab E Swala Dy g/Todd D Danda
10	By s/Sarah E. Swale Sarah E. Swale, WSBA No. 29626  Will M. T. WSBA No. 29626  By s/Todd R. Renda Todd R. Renda, WSBA No. 13542
11	Kelly M. Turner, WSBA No. 43022 Attorneys for Plaintiff Attorneys for Defendants
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14	<u>ORDER</u>
15	IT IS SO ORDERED.
16	DATED this 30th day of October, 2013.
17	Kalet Byan
18	ROBERT J. BRYAN
19	United States District Judge
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21	PRESENTED BY:
22	LANE POWELL PC
23	By <u>s/Sarah E. Swale</u> Sarah E. Swale, WSBA No. 29626
24	Kelly M. Turner, WSBA No. 43022 Attorneys for Defendants
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STIPULATION AND ORDER- 2 No. C13-5854-RJB 121731.0002/5861876.1 LANE POWELL PC 1420 FIFTH AVENUE, SUITE 4100 SEATTLE, WASHINGTON 98101-2338 206.223.7000 FAX: 206.223.7107

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1	APPROVED; NOTICE OF PRESENTATION WAIVED:
2	TODD R. RENDA, ATTORNEY AT LAW
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4	By s/Todd R. Renda Todd R. Renda WSRA No. 20770
5	By s/Todd R. Renda Todd R. Renda, WSBA No. 20779 Attorney for Plaintiff
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STIPULATION AND ORDER- 3 No. C13-5854-RJB 121731.0002/5861876.1 LANE POWELL PC 1420 FIFTH AVENUE, SUITE 4100 SEATTLE, WASHINGTON 98101-2338 206.223.7000 FAX: 206.223.7107

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STIPULATION AND ORDER-4 No. C13-5854-RJB 121731.0002/5861876.1

## **CERTIFICATE OF SERVICE**

Pursuant to RCW 9.A.72.085, the undersigned certifies under penalty of perjury under the laws of the State of Washington and the United States, that on the 28th day of October, 2013, the document attached hereto was presented to the Clerk of the Court for filing and uploading to the CM/ECF system. In accordance with their ECF registration agreement and the Court's rules, the Clerk of the Court will send e-mail notification of such filing to the following:

Todd R. Renda Attorney at Law 6314 19<sup>th</sup> Street West, Suite 21 Tacoma, WA 98466-6233 Email: toddrenda@msn.com

DATED this 28th day of October, 2013, at Seattle, Washington.

s/Lorrie A. Salinas Lorrie A. Salinas

> LANE POWELL PC 1420 FIFTH AVENUE, SUITE 4100 SEATTLE, WASHINGTON 98101-2338 206.223.7000 FAX: 206.223.7107